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REPORT SERIES 1988

88-10 AMO RESPONSE TO BILL 170 - AGGREGATE RESOURCES ACT

THE ASSOCIATION OF MUNICIPALITIES OF ONTARIO
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ASSOCIATION OF MUNICIPALITIES OF ONTARIO

The Association of Municipalities of Ontario, a non-partisan voluntary organization, is united to promote the values of the municipal government system and the status of the municipal level of government as a vital and essential component of the total inter-governmental framework of Ontario and Canada.

The Association acts as the collective voice of Ontario's municipal governments and is organized to accomplish through cooperation and coordination, what the majority have neither the time nor the resources to do individually.

The Association represents some seven hundred (700) municipal governments throughout Ontario. The governing body is composed of some eighty (80) municipal elected and appointed officials, who in turn represent a wide-range of municipal government interest.

The following sections and affiliated municipal professional associations form an important part of the Association's structure and therefore, play an important part in its activities in terms of the Board of Directors, program and policy development:

Association Sections:

* County and Regional Section
* Large Urban Section
* Northern Ontario Section (FONOM/NOMA)
* Rural Section (ROMA)
* Organization of Small Urban Municipalities Section

Association Affiliates:

* Association of Municipal Clerks and Treasurers of Ontario
* Association of Municipal Tax Collectors of Ontario
* Municipal Engineers Association
* Ontario Municipal Administrators Association
* Ontario Municipal Personnel Association
* Ontario Municipal Social Services Association
* Society of Directors of Municipal Recreation of Ontario
* Urban Finance Officers Association of Ontario

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EXECUTIVE SUMMARY

Bill 170, An Act to revise several Acts related to Aggregate Resources, was introduced in June 1988. The bill replaces three existing pieces of legislation: the Pits and Quarries Control Act, Part VII of the Mining Act, and the Beach Protection Act. The bill is aimed at more effectively managing Ontario's aggregate resources, minimizing adverse impacts upon the environment, rehabilitating land from which aggregate has been extracted, and controlling aggregate operations on Crown and private land.

The Association has had several opportunities to comment on various elements in the development of a provincial aggregate resource management strategy, including the introduction in 1979 of Bill 127, An Act to revise the Pits and Quarries Control Act, and the province's Proposed Mineral Aggregate Resource Planning Policy statements in 1980 and 1984.

Bill 170 introduces some significant reforms to aggregate resources management that address many of the inadequacies associated with the existing legislation. These reforms include the preparation of an environmental report as a precondition to the issuance of a pit or quarry licence, more comprehensive site plan requirements and the introduction of a rehabilitation fund for the management of abandoned pits and quarries. The bill also offers municipalities an enhanced role in the aggregate resources management process through increased review and commenting opportunities, and attempts to balance the costs of aggregate activities through its proposed municipal compensation mechanism.

The Association offers some recommended revisions with respect to the suitability and periodic review of the annual levy, the definition of wayside pits, and the definition of the environment contemplated by the bill. Support of the bill in principle is granted in recognition of the improvements offered over the existing legislation.

INTRODUCTION

In 1979 Bill 127, An Act to Amend the Pits and Quarries Control Act, 1971, was introduced. At that time the Association of Municipalities of Ontario prepared a response to the proposed legislation. Generally, this response outlined a continuing concern with the failure of aggregate resource legislation to recognize and adequately balance the various interests affected by extraction activities. After receiving a first reading, the bill died on the order paper.

Bill 127 was re-introduced in 1980, and subsequently sent to a legislative standing committee. Disparate views led to a vast number of submissions to the committee, and the tabling of over 100 amendments to the bill. Again, Bill 127 died on the order paper amidst a flurry of debate.

By 1983 there was a growing interest by municipalities in having Bill 127 re-introduced, primarily because of the bill's provision for the disbursement of annual licence fees to municipalities. Two significant resolutions, one by Peel Region in 1984 and the other by Puslinch Township in 1986 calling for the re-introduction of Bill 127 - type legislation, contributed to the eventual introduction of Bill 170, An Act to revise several Acts related to Aggregate Resources.

AMO POSITION

The Association has had several opportunities to comment on various elements in the development of a provincial aggregate resource management strategy, including the introduction in 1979 of Bill 127, An Act to revise the Pits and Quarries Control Act, and the Province's Proposed Mineral Aggregate Resource Planning Policy statements in 1980 and again in 1984. On each occasion, AMO has clearly voiced its concerns regarding the nature of the overall approach, as well as specifics related to each endeavour.

In January, 1980 the Association released a response to Bill 127. In it were identified three major concerns held by municipalities regarding aggregate resource management:

- The need to recognize greater local responsibility for planning and land use control;
- The need to recognize the special costs aggregate operations imposed on municipalities and to ensure that these are borne equitably by all;
- The need to recognize greater responsibility for protection of the environment.

In the same report, the Association outlined other more specific concerns with the existing Pits and Quarries Control Act, relating to site plan requirements, enforcement and rehabilitation.

In its critique of Bill 127 in remedying these matters AMO concluded that too much discretionary administrative power was vested in the Minister of Natural Resources and that neither the environment nor municipal planning received adequate consideration and protection. The result was an inequitable balancing of the various interests affected by aggregate resource activities.

This concern was reiterated by AMO in its responses to the Province's Proposed Mineral Aggregate Resource Policy in September, 1980, and the Provincial Mineral Aggregate Resource Planning Policy in May, 1984. In each response the Association maintained the position that all affected land uses and interests be given equal consideration in the decision to develop aggregate resources, and in particular, that municipalities be consulted in the administration of aggregate resource legislation.

ANALYSIS OF BILL 170

Introduction

Like its unsuccessful predecessor, Bill 170 is a significant departure from the existing Pits and Quarries Control Act. Increased protection of the environment and rehabilitation are included in the stated purposes of the bill. In order to achieve these objectives the new bill requires more detailed information on the operation, impacts and rehabilitation of aggregate activities prior to the issuance of a licence or permit. The bill also attempts to balance the interests of municipalities in aggregate resource management through increased municipal consultation and the introduction of a mechanism to provide financial compensation to municipalities from the production of aggregate.

While Bill 170 retains these key elements from the earlier proposed Bill 127, the new bill is somewhat broader in its application in that it includes provisions designed to replace the Beach Protection Act, and the quarry permits of the Mining Act. Bill 170 covers the entire province, including land under water, but exclude those private lands outside of designated areas. Like Bill 127, it provides that all land in the province may be designated at some future date.

Bill 170 - Provisions

Licences and Permits

Three types of licences or permits are to issued under the bill; pit or quarry licences, wayside permits and aggregate permits. A pit or quarry licence will be required to extract aggregate from any designated area in the province, other than Crown owned land or land under water. The bill provides for two classes of licences, based upon extraction of more or less than 20,000 tonnes of aggregate per year. In order to be granted either a Class A (more than 20,000 tonnes) or a Class B (20,000 tonnes or less) licence to operate, an applicant will be required to submit a detailed site plan.

A wayside permit will be available under the bill to either a public authority, or someone under contract to a public authority, for temporary project requiring aggregate that is not readily available from a nearby licenced source. The Permit itself will be of a temporary nature, expiring with the completion of the project, or after 18 months.

The bill introduces aggregate permits to replace quarry permits under the Mining Act and beach protection licences under the Beach Protection Act. An aggregate permit will be required for the excavation of aggregate or topsoil from any Crown land and land under water, except land which is designated under section 5 of the bill.

Site Plan

The site plans to be required under Bill 170 for Class A and B licences and wayside permits are more comprehensive and detailed than those set out under the existing Pits and Quarries Act. An applicant will, under the new bill, be required to consider significant natural and man-made features and surface and groundwater, reflecting the bill's stated goal of minimizing adverse environmental impacts. The sit plans to be required for aggregate permits are less comprehensive than those for licences or wayside permits, since the applicant will not be required to consider natural features in the area of the site or groundwater beneath the site.

Report

Another key element retained from the earlier proposed Bill 127 is the supplementary report to be required in an application for a Class A licence. This is a significant addition over the requirements of the existing Pits and Quarries Control Act, and reflects the goal of Bill 170 to increase protection of the environment from the impacts of aggregate activities. This report will have to, among other things, outline the suitability of the rehabilitation plans for the site with regard to adjacent lands, describe the environment likely to be affected by the operation and remedial measures to counter these effects, have regard for planning and land use considerations, and describe any potential social and economic effects of the operation.

Applicants for Class B licences, wayside permits and aggregate permits will not be required to submit an accompanying report.

Compliance with Municipal Planning

Bill 170 retains the principal of "municipal override" from the provisions of the existing Pits and Quarries Control Act, although the proposed bill is more clear in setting out those instances where municipal planning documents are inoperative.

In considering municipal by-laws, Bill 170 distinguishes between those zoning by-laws which regulate the location of aggregate activities within a municipality, and by-laws which attempt to regulate or prohibit the operation of a site. Under the provisions of Bill 170, the location of a pit or quarry will have to comply with relevant municipal zoning by-laws, giving municipalities control of the location of such activities. A wayside permit may be issued by the Minister whether or not the location of the site complies with the same zoning by-laws.

Section 66 of the bill however, provides that the provisions of the bill will override any municipal by-laws, official plan or development agreement which treat the same subject matter in different ways. Furthermore, the section will render inoperative any by-laws which attempt to regulate or prohibit aggregate operations. This prohibition is significantly broader than that provided in the current Pits and Quarries Control Act.

Municipal Notice

Bill 170 expands the notice requirements of the existing Pits and Quarries Control Act in an attempt to bring more interests, particularly municipalities, into the aggregate management process. Under Bill 170 municipalities will be entitled to receive notice of a broader range of actions by the Minister of Natural Resources. In the case of an application for a pit or quarry licence, the Minister will be required to give a copy of the application and accompanying documents to the local and regional municipalities in which the site is located. The municipalities will have 30 days in which to provide comments on the application to the Minister, and these comments will be considered by the Minister in the decision to grant a licence.

Municipalities will also be notified by the Minister of the issuance or transfer of a licence, or of any amendments to a site plan. In this latter instance, a municipality will be given a 30 day period in which to submit comments to the Minister regarding the amendments.

Similarly, a copy of an application for a wayside permit will be given to a municipality, and any comments of the municipality will be considered by the Minister in the decision to issue the permit. Where a permit is issued, the municipality will be given a copy. A municipality will also be notified in the event of a change to the conditions of a wayside permit or of the suspension or revocation of a permit.

Issuance of a Licence

Under Bill 170 the Minister will be required to have regard for a broad list of considerations in deciding whether to issue a licence or a wayside permit to an applicant. These matters are to include comments provided by the municipalities in which the site is located, possible ground or surface water effects, and effects of the operation on the environment in general. Again, these considerations not only reflect the goal of the bill to increase the protection of the natural environment, but also recognize the need to consult with the municipalities in which the site is located. The increased municipal consultation proposed by Bill 170 is an improvement over the autocracy of the existing Pits and Quarries Act, and appears to be a genuine attempt to resolve the concerns voiced by municipalities in this regard.

Licence and Permit Fees

The bill provides that all licenced aggregate operations will pay a fee to the province. In the case of a pit or quarry this fee will take the form of an annual operating fee, equal to the amount of the original application fee or a rate per tonne extracted fee, whichever is greater. An applicant for a wayside permit will be required to pay either a permit fee, or a fee based upon the maximum amount authorized to be extracted, whichever is greater. Aggregate permittees are to be required to pay a royalty to the Crown for each tonne of aggregate extracted from land owned by the Crown.

Disbursal of Fees to Municipalities

The financial compensation of municipalities from aggregate extraction activities was a significant feature of Bill 127, and is retained in Bill 170.

Under the provisions of the bill a portion of the fees collected by the province for pit and quarry licences and wayside permits are to be disbursed to the various municipalities which have these aggregate activities within their boundaries. Although the philosophy behind this mechanism is to compensate municipalities for the costs associated with having aggregate activities within their boundaries, the funds are not earmarked in the bill toward any specified purpose. The municipalities to receive funds, the portion to be disbursed and the manner of disbursal are to be set out in the regulations.

Royalties collected from the extraction of aggregate from Crown land are not to be distributed to municipalities.

Rehabilitation Fund

The bill also provides that a rehabilitation fund may be created by the province, financed by a portion of the annual licence fees for pits and quarries, and the permit fees for wayside permits. This fund may be drawn upon by the Province for the management of abandoned pits or quarries. The provision for such a fund is another significant change first introduced by Bill 127 and retained by Bill 170.

Review

An annual review by the Minister of each licenced pit or quarry site will be required under the bill, to monitor compliance with the legislation, the site plan and any conditions on the licence. As part of this review the Minister will be required to consider comments provided by the municipalities in which the site is located.

Additionally, every four years each municipal council will be requested to submit comments to the Minister on each licenced pit or quarry site within its boundaries.

The provision for municipal participation in a regular performance review by the province of licenced pits and quarries not only strengthens the municipal role in aggregate resource management, but also represents an opportunity to alleviate some of the prevailing inadequacies regarding enforcement under the current Pits and Quarries Control Act.

Hearings

Hearings into matters respecting pit and quarry licences (e.g. public objection, Minister's refusal to issue a licence, revocation of a licence, amendment of a site plan) are to be held before the Ontario Municipal Board, which sets outs its findings and recommendations in a report to the Minister. After considering the report of the Board, the Minister is to make a decision on the matter. This decision will be final and therefore can not be appealed to Cabinet.

Under the bill's provisions for aggregate permits an applicant or holder of an aggregate permit will be entitled to a hearing in several circumstances, including where the Minister refuses to issue an aggregate permit, revokes a permit, requires the amendment of a site plan, or proposes to vary a site plan condition. Hearings related to aggregate permit matters will be referred by the Minister to the Mining and Lands Commissioner who, after conducting the hearing, will make a recommendation to the Minister. After considering the recommendation of the Commissioner, the Minister will make the final decision on the matter.

Abandoned Pits and Quarries

An important new feature of aggregate resource management which was introduced in Bill 127 and is retained in Bill 170 is the management of abandoned pits and quarries. Under Bill 170 a portion of the fees collected for pit and quarry licences and wayside permits may be placed in a separate fund to be used for the rehabilitation of abandoned pits or quarries. Where a pit or quarry is unlicensed, the province may declare the pit or quarry abandoned, after first receiving the consent of the person assessed for the land and after consulting with the regional and local municipalities in which the site is located. Having declared a pit or quarry abandoned, the Minister may disburse funds from the rehabilitation fund for the study and rehabilitation of the site.

Rehabilitation

Part VI of Bill 170 sets out the requirements to be met by every licensee and permittee with respect to the progressive and final rehabilitation of a site. Under this part licensees and permittees will be required to contribute security payments for the rehabilitation of a site. Where the Minister is furnished with proof of progressive and/or final rehabilitation the licensee or permittee will be entitled to a refund out of the security fund. Where rehabilitation is not performed, the Minister may undertake to rehabilitate the site and have the cost defrayed by the licensee's or permittee's contribution to the security fund.

Conclusions - Association Support

Bill 170 introduces some significant reforms to aggregate resources management that address many of the inadequacies associated with the existing Pits and Quarries Control Act. These reforms include the preparation of an environmental report as a precondition to the issuance of a pit or quarry licence, more comprehensive site plan requirements and the introduction of a rehabilitation fund for the management of abandoned pits and quarries. The bill also offers municipalities an enhanced role in the aggregate resources management process through increased review and commenting opportunities, and attempts to balance the costs of aggregate activities through its proposed municipal compensation mechanism.

Recommendation 1

That, in light of the improvements offered over the existing Pits and Quarries Control Act, AMO support in principle the proposed Bill 170.

ISSUES AND RECOMMENDATIONS

Suitability of Production Levy

The annual production levy for aggregate extraction under Bill 170 would be set at six cents per tonne. Of this six cents, four cents per tonne would be disbursed to local municipalities, one-half a cent per tonne to upper-tier municipalities, one-half a cent to the rehabilitation fund established under the bill, and one cent to the Province. While AMO supports the effort to compensate municipalities for the costs of aggregate activities, the Association is concerned that the six cent per tonne levy was first calculated some eight years ago under Bill 127. This six cent per tonne levy was reviewed in 1986 and retained, but it remains a concern that this figure will not adequately reflect the growing costs associated with aggregate activities. Assuming a five per cent inflation rate over the past eight years, the six cent per tonne levy calculated in 1980 would have to be increased to nine cents per tonne in order to remain equitable in 1988.

Recommendation 2

That the rationale or formula applied to determine the six cent per tonne levy under Bill 127 be used to recalculate the levy to be imposed under Bill 170, so that the levy reflects current costs.

Review of the Levy

The levy imposed by the Province and disbursed to municipalities is designed to reflect the costs of aggregate activities. For this to continue, a periodic review of the levy should be included in the provisions of the bill. As well, the review should ensure that the apportionment between upper and lower-tier municipalities continues to reflect costs borne by each level.

Recommendation 3

That a review be carried out every two years, and that this review address the suitability of the levy and the apportionment between upper and lower-tier municipalities with regard to the costs of aggregate activities.

Definition of Wayside Pits

Under the current Pits and Quarries Control Act neither the size of a wayside pit nor the lifetime of a pit is adequately regulated. With Bill 170 these deficiencies could be remedied with the inclusion of a clear definition of a wayside pit. This definition should provide that a maximum extraction limit over the designated life of a pit be set out in the regulations under the bill. This limit would clearly distinguish wayside pits from pits and quarries in terms of size, thus requiring excessively large wayside pits to meet the more stringent standards of pit and quarry licence applications. As well, a tonnage limit applied to the life of a pit would remedy the issue of wayside pits ultimately operating on a permanent basis through intermittent or successive reapplication.

Recommendation 4

That Bill 170 include a definition of wayside pits, and that this definition require that a maximum tonnage limit for the designated life of a wayside pit be set out in the regulations.

Definition of Municipality

The Association is concerned that the terms "municipality" and "municipalities" have been used in the bill, but that a definition has only been provided for a "regional municipality".

Recommendation 5

That, for greater clarity, Bill 170 include a definition of "municipality", and that this definition include local, county and regional municipalities.

Narrow Definition of "Environment"

While Bill 170 offers an improved list of definitions over the existing Pits and Quarries Control Act, the definition of the term environment raises some questions. Where the current Pits and Quarries Control Act does not include a definition of the term "environment", it is defined in Bill 170 to mean the "use, condition and natural features of the site and adjacent lands". This definition is limited in two respects.

Firstly, restricting consideration to the site and adjacent lands ignores the wider environmental impacts associated with intrusive activities such as quarrying. These impacts include noise, truck traffic and ground water disruption, among other things, and are not restricted to adjacent lands. The inadequacy of the definition is highlighted by the fact that several other "environmental impact" related considerations are included in those matters to be considered by the Minister, in addition to the effect of the operation on the "environment" as defined in the bill. By employing a narrow definition of the environment and then attempting to address by other means those areas excluded from the definition, the bill becomes unnecessarily cumbersome.

The second difficulty with the restricted definition of the environment in Bill 170 lies in the stated purposes of the bill, one of which is to minimize adverse impacts on the environment caused by aggregate operations. This goal of protecting the environment is weakened by the limited definition of the environment contemplated by the bill.

Recommendation 6

That a broader definition of the environment be employed in Bill 170.

Additional Recommendations

Recommendation 7

That, where a pit or quarry is municipally owned, the municipality be exempt from paying that part of the levy which will be returned to it.

Recommendation 8

That the fee/levy be implemented January 1, 1989 as contractors would know sufficiently in advance to include the additional costs in their bids for contracts.

Recommendation 9

That the Province introduce a licensing system for blasting.

Recommendation 10

That notification procedures include a posting at the site indicating that a licence application has been made, and that, subsequent to approval, a notice be posted indicating that a licence is in effect, whether or not the pit or quarry is currently in operation.

Recommendation 11

That the licence suspension process be supported, provided the control mechanism is so delegated as to provide immediate enforcement capabilities at the local inspection level.

LIST OF RECOMMENDATIONS

Recommendation 1

That, in light of the improvements offered over the existing Pits and Quarries Control Act, AMO support in principle the proposed Bill 170.

Recommendation 2

That the rationale or formula applied to determine the six cent per tonne levy under Bill 127 be used to recalculate the levy to be imposed under Bill 170, so that the levy reflects current costs.

Recommendation 3

That a review be carried out every two years, and that this review address the suitability of the levy and the apportionment between upper and lower-tier municipalities with regard to the costs of aggregate activities.

Recommendation 4

That Bill 170 include a definition of wayside pits, and that this definition require that a maximum tonnage limit for the designated life of a wayside pit be set out in the regulations.

Recommendation 5

That, for greater clarity, Bill 170 include a definition of "municipality", and that this definition include local, county and regional municipalities.

Recommendation 6

That a broader definition of the environment be employed in Bill 170.

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That, where a pit or quarry is municipally owned, the municipality be exempt from paying that part of the levy which will be returned to it.

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Recommendation 11

That the licence suspension process be supported, provided the control mechanism is so delegated as to provide immediate enforcement capabilities at the local inspection level.

APPENDIX I

Minority Report of the County and Regional Section

In its review of the draft AMO response to Bill 170, the County and Regional Section Executive adopted several recommendations which were not subsequently endorsed by the AMO Executive Committee. These additional recommendations, forming the minority report of the County and Regional Section, are listed below.

1. **Recommendation**

   That the annual levy be disbursed to municipalities as a payment-in-lieu for the purposes of calculating the upper-tier apportionment or mill rate levied for general municipal and upper-tier purposes, excluding education.

   Comments

   This recommendation was introduced by the County and Regional Executive to attempt to correct a perceived imbalance in the proposed apportionment between upper and lower-tier municipalities.

2. **Recommendation**

   That a statement of objectives for the administration of the bill be included in Bill 170.

   Comments

   The County and Regional Executive felt that clear articulation of objectives to fulfill Bill 170's purposes would assist in assigning a relative priority to each of the various matters to be considered by the Minister, thereby ensuring the proper balancing of diverse interests and enhancing the reliability and accountability of decisions made.

3. **Recommendation**

   That Bill 170 include a requirement that need be established in an application for a licence or permit, and further, that this demonstration of need be considered by the Minister in the decision to issue a licence permit.

   Comments

   The County and Regional Executive felt that requiring a demonstration of need by an applicant would permit greater control against overdevelopment in areas of high aggregate resource value.

4. Recommendation

That an application for wayside permit be required to include the identification and description of alternative sources of aggregate in the vicinity of the proposed wayside pit.

Comments

The County and Regional Executive felt that the need for a wayside pit should be established through a demonstrated lack of availability of alternate sources.

APPENDIX II

Minority Report of the Rural Section

Both the Rural Section Planning and Legislative Committee and the Rural Section Executive had an opportunity to review the draft AMO response to Bill 170. Both Committees adopted recommendations which were not subsequently endorsed by the AMO Executive Committee. These recommendations make up the minority report of the Rural Section, and are listed below.

1. **Recommendation**

   That four cents per tonne to the local municipality is considered inadequate. It is a start however, and so long as the legislation or regulations do not specify that the funds be applied toward road repairs and maintenance (so as to effect road subsidies), the levy is acceptable.

   Comments

   The Rural Section Executive felt that the six cents per tonne levy, however inadequate, is an improvement over the current situation.

2. **Recommendation**

   That a review of the levy be carried out every five years.

   Comments

   The Rural Section Executive felt that a review every two years would be unnecessarily onerous.

3. **Recommendation**

   That Bill 170 include a definition of wayside pits and quarries, and that a limited life for wayside pits and quarries be set out in the definition.

   Comments

   The Rural Section Executive preferred a time limit rather than a total amount extracted limit for the life of a wayside pit.

4. **Recommendation**

   That the provincial enforcement staff attend to the day-to-day operating infractions.

   Comments

   The Rural Section Executive expressed a concern with current enforcement practices.

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